CONSENT TO EXTEND THE TIME TO

| ASSE | ESS CIVIL PENALTIES PROVIDED BY |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 31 U. | S.C. § 5321 FOR FBAR VIOLATIONS |
| | he parties to this agreement desire to extend the time during which the 31 U.S.C. 5321 may be assessed and collected, |
| WHEREAS, t sign this consent, | the parties to this agreement are aware that they have the right to refuse to |
| | Alexandru Bittner, (name and taxpayer identification number) |
| 14-11-1-01-1 | |
| United States person, o | (address) |
| following: (1) For violations United States person to authority, over a financi that was maintained wit penalty provided by 31 (2) This conser U.S.C. 6501 for assessi | swith respect to the requirement, established under 31 U.S.C. 5314, for a report having a financial interest in or signature authority, or other al account during the calendar years ending December 31, 2009 that financial institution located in a foreign country, the amount of any U.S.C. 5321 may be assessed at any time on or before June 30, 2017 at does not reduce, waive, or extend any period of limitation under 26 ing or collecting tax. This consent also does not supersede or amend any en the United States person and the Internal Revenue Service. Signature of the United States Person Additional States Person |
| <u>Date</u> | Signature of Authorized Representative |
| Date 6/38/16 | Signature of the Commissioner's Delegate John M. Dunner Rynny Rume April Title |
| | Internal Revenue Service |
| | JUN 2 8 2016 |
| | LB&I International |
| | Government Exhibit |

DOJ 000707